

TROY LAW, PLLC
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Attorney for the Plaintiff, proposed FLSA Collective and potential Rule 23 Class

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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LIYOU XING,
on her own behalf and on behalf of others similarly situated

Plaintiff,

v.

MAYFLOWER INTERNATIONAL HOTEL GROUP
INC d/b/a Mayflower Hotel;
MAYFLOWER BUSINESS GROUP, LLC d/b/a
Wyndham Garden;
MAYFLOWER INN CORPORATION d/b/a Mayflower
Hotel;
MAYFLOWER WENYU LLC d/b/a Wyndham Garden;
YAN ZHI HOTEL MANAGEMENT INC. d/b/a
Mayflower Hotel; and
MAYFLOWER 1-1 LLC d/b/a Mayflower Hotel;
YUEHUA HU,
WEI HONG HU, and
XIAOZHUANG GE

Defendants.

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JOHN TROY, an attorney admitted to practice law in the State of New York and before the United States District Court for the Eastern District of New York, hereby affirms under penalty of perjury that:

1. I am the principal of Troy Law, PLLC, attorney for the Plaintiffs and putative class in this action. I submit this affirmation in support of Plaintiff's motion for an Order granting collective action status pursuant to 29 U.S.C. § 216(b) for Plaintiff's claims under the Fair Labor Standards Act.

Case No. 18-cv-06616

**29 U.S.C. § 216(b)
COLLECTIVE ACTION &
FED. R. CIV. P. 23 CLASS
ACTION**

**DECLARATION OF JOHN
TROY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
CONDITIONAL
COLLECTIVE
CERTIFICATION**

2. The putative class consists of the named Plaintiff and all current and former nonexempt employees of Defendants MAYFLOWER INTERNATIONAL HOTEL GROUP INC d/b/a Mayflower Hotel; MAYFLOWER BUSINESS GROUP, LLC d/b/a Wyndham Garden; MAYFLOWER INN CORPORATION d/b/a Mayflower Hotel; MAYFLOWER WENYU LLC d/b/a Wyndham Garden; YAN ZHI HOTEL MANAGEMENT INC. d/b/a Mayflower Hotel; and MAYFLOWER 1-1 LLC d/b/a Mayflower Hotel; YUEHUA HU, WEI HONG HU, and XIAOZHUANG GE (collectively the “Defendants”) who worked as non-exempt, non-managerial employees from November 20, 2015 to present. Corporate officers, shareholders, directors, administrative employees, managers, and other customarily exempt employees are not part of the defined class.

3. The following exhibits are annexed:

1. Exhibit 01 – Complaint;
2. Exhibit 02 – Amended Complaint in a Related Case;
3. Exhibit 03 – Proposed Notice of Pendency; and Consent to Sue Form
4. Exhibit 04 – Proposed Publication Order;
5. Exhibit 05 – Affidavit of Liyou Xing in Support of Plaintiffs’ Motion for Conditional Collective Certification;
6. Exhibit 06 – Affidavit of Junhui Yan in support of Plaintiffs’ Motion for Conditional Collective Certification;
7. Exhibit 07 – Affidavit of Loi Wing Kit in support of Plaintiffs’ Motion for Conditional Collective Certification;
8. Exhibit 08 – Affidavit of Shuk C. Ng-Lam in support of Plaintiffs’ Motion for Conditional Collective Certification; and

4. As alleged in the complaint, the Named Plaintiff and proposed members of the putative collective class experienced a common set of policies and practices by the Defendants as to wages and hours that violated the FLSA, and there are more similarly situated current and former employees who have been subjected to the same unlawful employment practices.

5. Plaintiff alleges that he has personal knowledge of other employees who were subject to these policies and the details are further set forth in his affidavit herewith.

6. Troy Law, PLLC, has considerable experience in employment and labor law, and has successfully represented workers in numerous cases similar to the case at bar to recover unpaid overtime and minimum wage pay in federal and state courts under the Fair Labor Standards Act and New York Labor Law.

7. For the reasons set forth above and those set forth in the accompanying Memorandum of law, Plaintiff respectfully requests that this Court enter an Order granting collective action status, pursuant to 29 U.S.C. § 216(b) for Plaintiff's claims under the Fair Labor Standards Act.

Dated: Flushing, New York
May 15, 2019

Respectfully submitted,
Troy Law, PLLC.

*Attorneys for Plaintiffs and proposed
collective action members*

By: /s/John Troy

John Troy, Esq.
Attorney for Plaintiff